

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

DAVID BRADBERRY,

Plaintiff,

v.

CASE NO. 1:23-cv-09440-JHR

ABERCROMBIE & FITCH CO.;
MICHAEL S. JEFFRIES;
MATTHEW SMITH, and
THE JEFFRIES FAMILY OFFICE, LLC,

Defendants.

**DEFENDANT THE JEFFRIES FAMILY OFFICE, LLC'S
NOTICE OF MOTION TO DISMISS THE FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon its Memorandum of Law, Defendant, The Jeffries Family Office, LLC, will move this Court before The Honorable Jennifer H. Rearden, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007-1312, at a time and place to be set by the Court, for an order pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure dismissing all claims against them set forth in the Individual and Class Action First Amended Complaint [ECF No. 82] filed by Plaintiff, David Bradberry, in this action, together with such other and further relief as this Court may deem just and proper.

Dated: October 4, 2024

**NELSON MULLINS
RILEY & SCARBOROUGH**

/s/ Ryan K. Todd

Mark Raymond (PHV)

Ryan K. Todd (PHV)

One Biscayne Tower, 21st Floor

Miami, FL 33131

Telephone: 305.373.9400

mark.raymond@nelsonmullins.com

ryan.todd@nelsonmullins.com

Mitchell Boyarsky
New York Bar No. 2667780
330 Madison Avenue, 27th Floor
New York, NY 10017
Telephone: 212-413-9000
mitch.boyarsky@nelsonmullins.com
*Co-Counsel for the Defendant, The Jeffries
Family Office, LLC*

- and -

GRAY | ROBINSON, P.A.

/s/ John A. Boudet
John A. Boudet, Esquire
Admitted Pro Hac Vice
301 East Pine Street, Suite 1400
Orlando, Florida 32801
Telephone: (407) 843-8880
Facsimile: (407) 244-5690
john.boudet@gray-robinson.com

*Counsel for the Defendant, The Jeffries
Family Office, LLC*